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From: Local Plan Review
Subject: FW: NHSPS - Local Plan Review Proposed Submission Consultation
Attachments: NHSPS Consultation Response - Mid Devon Local Plan Review 14022016.pdf

From: Adams Mark (NHS Property Services) [REDACTED]
Sent: 14 February 2017 16:41
To: Local Plan Review
Subject: NHSPS - Local Plan Review Proposed Submission Consultation

Dear Sir/Madam,

Please find attached NHS Property Services Ltd's response to the above consultation.

Please could you acknowledge receipt.

Kind Regards

Mark

Mark Adams | Senior Town Planner (MRTPI)

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Date: 14th January 2017

Dear Sir/Madam

NHS Property Services – Consultation on Proposed Submission (incorporating proposed modifications)

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

Foreword

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

Policy S8 – Infrastructure

When planning for new settlements, the Council should ensure that they work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development.

Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The Council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable

Policy DM23– Community Facilities

Policy DM23 and its supporting text restrict proposals that involve the loss of a community facility.

Although healthcare facilities are not specifically identified as a 'community facility', the use of such a broad term without a clear definition is ambiguous. The emerging Policy should specify exactly what is meant by 'local services and community facilities' to prevent misinterpretation.

Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.

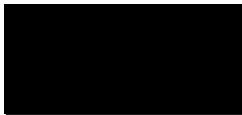
Restrictive policies that prevent the loss or change of use of 'community facilities' and include healthcare facilities within this definition can prevent or delay required investment in alternative

facilities and work against the Council's aim of providing essential services for the community. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.

An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).

Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.

Yours sincerely



Mark Adams
Senior Town Planner (MRTPI) – NHS Property Services Ltd